

Brian F. McDonough (NJ Attorney ID 026121980)
Assistant Attorney General
New Jersey Office of the Attorney General
124 Halsey Street, 5th Floor
Newark, NJ 07101
Tel: (609) 696-5271

Brent Johnson (NJ Attorney ID 031902003)
Emmy L. Levens (*pro hac vice* forthcoming)
Robert A. Braun (*pro hac vice* forthcoming)
COHEN MILSTEIN SELLERS & TOLL PLLC
1100 New York Avenue NW, Suite 800
Washington, DC 20005
(202) 408-4600

Additional Counsel on Signature Page

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

MATTHEW J. PLATKIN, Attorney General of
the State of New Jersey; ELIZABETH
HARRIS, Acting Director of the New Jersey
Division of Consumer Affairs,

Plaintiffs,

v.

RealPage, Inc. et al.,

Defendants.

Case No. 2:25-cv-03057 (SDW) (JSA)

STIPULATION AND ~~PROPOSED~~ ORDER AS TO SCHEDULING OF DEFENDANTS'
RESPONSES TO THE COMPLAINT

Plaintiffs Matthew J. Platkin, Attorney General of the State of New Jersey, and Elizabeth Harris¹, Acting Director of the New Jersey Division of Consumer Affairs (collectively “Plaintiffs”) and Defendants RealPage, Inc. (“RealPage”); Morgan Properties Management Company, LLC; AvalonBay Communities, Inc.; LeFrak Estates, L.P. (“LeFrak”); Greystar Management Services, LLC (“Greystar”); AION Management, LLC; Cammeby’s Management Co. of New Jersey L.P. (“Cammeby’s”); Veris Residential, Inc.; Russo Development, LLC, and Russo Property Management, LLC (collectively, “Russo”); the Kamson Corporation (“Kamson”); and Bozzuto Management Company (collectively “Defendants,” and with Plaintiffs, “Parties”) hereby submit the following stipulation regarding the schedule for Defendants’ responses to the Complaint:

WHEREAS, Plaintiffs initiated this action on April 23, 2025, by filing a redacted copy of the Complaint publicly and an unredacted copy of the Complaint under seal;

WHEREAS, Plaintiffs served Defendants² with a copy of the redacted Complaint and then with a copy of the unredacted Complaint after those Defendants agreed to abide by a Protective Order entered in a related case that protects sealed information from disclosure;

WHEREAS, most Defendants subsequently returned waivers of service of the Complaint, pursuant to which Defendants have varying response dates in June and July 2025. *See* ECF Nos. 6, 7, 8, 9, 10, 13, 20, 21³;

¹ Pursuant to Fed. R. Civ. P. 25(d), the caption has been revised to reflect the current Acting Director of the Division of Consumer Affairs.

² Plaintiffs served all named Defendants and requested that each contact Plaintiffs to facilitate the provision of a copy of the unredacted Complaint. Each of the Defendants is a signatory to this stipulation except for Realty Operations Group LLC. Counsel for LeFrak informed Plaintiffs on May 15, 2025, that LeFrak and Realty Operations Group LLC are not separate entities—Realty Operations Group is, accordingly, represented by the same counsel as LeFrak. Plaintiffs and LeFrak are currently discussing next steps to address this issue.

³ Defendants RealPage, Cammeby’s, Greystar, and Kamson acknowledge that they have been properly served with the Complaint and summons in this action and waive any objection to the sufficiency of service under Rule 12(b)(5) of the Federal Rules of Civil Procedure.

WHEREAS, certain Defendants anticipate responding to the Complaint by motion rather than by answer. For the convenience of the Court and the Parties, the Parties have agreed that all Defendants' responses to the Complaint may be filed on or before July 15, 2025;

WHEREAS, the Parties agree that on or before June 17, 2025, Defendants, reserving all rights, will notify Plaintiffs of the anticipated nature of the responses to the Complaint they intend to file and provide a good faith estimate of the number of responses and any proposals regarding extensions of page length;

WHEREAS, the Parties anticipate separately submitting a joint proposed briefing schedule closer to the agreed-upon response date for the Complaint;

THEREFORE, IT IS HEREBY STIPULATED AND AGREED, among the Parties, subject to the Court's approval, that Defendants shall have until July 15, 2025, to respond to the Complaint.

June 3, 2025

Respectfully submitted,

MATTHEW J. PLATKIN
ATTORNEY GENERAL OF NEW JERSEY

/s/ Brian F. McDonough
Brian F. McDonough (NJ Attorney ID 026121980)
Assistant Attorney General
Brian.McDonough@law.njoag.gov

David Reichenberg (NJ Attorney ID 507282024)
Deputy Attorney General
Section Chief, Antitrust Section
David.Reichenberg@law.njoag.gov

Jesse J. Sierant (NJ Attorney ID 049342013)
Deputy Attorney General
Section Chief, Consumer Fraud Prosecution Section
Jesse.Sierant@law.njoag.gov

Leslie Prentice (NJ Attorney ID 021952011)
Deputy Attorney General

Antitrust Section
Leslie.Prentice@law.njoag.gov

Blair Gerold (NJ Attorney ID 294602019)
Deputy Attorney General
Consumer Fraud Prosecution Section
Blair.Gerold@law.njoag.gov

New Jersey Office of the Attorney General
124 Halsey Street, 5th Floor
Newark, NJ 07101
Tel: (609) 696-5271

Attorneys for Plaintiffs

/s/ Brent W. Johnson
Brent Johnson (NJ Attorney ID 031902003)
Emmy L. Levens (*pro hac vice* forthcoming)
Robert A. Braun (*pro hac vice* forthcoming)
COHEN MILSTEIN SELLERS & TOLL PLLC
1100 New York Avenue NW, Suite 800
Washington, DC 20005
(202) 408-4600
bjohnson@cohenmilstein.com
elevens@cohenmilstein.com
rbraun@cohenmilstein.com

Aaron J. Marks (*pro hac vice* forthcoming)
COHEN MILSTEIN SELLERS & TOLL PLLC
88 Pine Street, 14th Floor
New York, NY 10005
(212) 838-7797
amarks@cohenmilstein.com

Attorneys for Plaintiffs

SO ORDERED.

Date: **June 5, 2025**

/s/ Jessica S. Allen

The Honorable Jessica S. Allen
United States Magistrate Judge